

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

NANCY ROBERTSON,

Plaintiff,

versus

**WILLIAMS-SONOMA STORES, INC.
AND WILLIAMS-SONOMA, INC.,**

Defendants.

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CIVIL ACTION NO. H-11-4299

JURY QUESTIONS

QUESTION NO. 1

Do you find, by a preponderance of the evidence, that Williams-Sonoma terminated Plaintiff because of Plaintiff's age, in violation of the ADEA?

Answer "Yes" or "No."

"Yes"

Please proceed to Question No. 2.

QUESTION NO. 2

Do you find, by a preponderance of the evidence, that age was a motivating factor in Williams-Sonoma's decision to terminate Plaintiff, in violation of the TCHRA?

Answer "Yes" or "No."

"yes"

If you have answered "Yes" to either Question No. 1 or Question No. 2, or both, please proceed to Question No. 3. If you have answered "No" to both Question No. 1 and Question No. 2, do not answer any more questions. Please sign and date the Certificate and return it to the Court.

QUESTION NO. 3

What sum of money, if any, if paid now in cash, would fairly and reasonably compensate Plaintiff for her damages, if any?

Answer in dollars and cents, if any:

Back pay and benefits:

\$ 109,676.85

Pain and suffering and mental anguish in the past:

\$ 219,353.70

Pain and suffering and mental anguish in the future:

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Please proceed to Question No. 4.

QUESTION NO. 4

If you have answered "Yes" to Question No. 1, please answer the following question.

Was any violation of the ADEA by Williams-Sonoma "willful"?

Answer "Yes" or "No."

"Yes"

Please proceed to Question No. 5.

QUESTION NO. 5

If you have answered "Yes" to Question No. 2, please answer the following question.

Do you find, by clear and convincing evidence, that Williams-Sonoma engaged in the discriminatory practice that you have found in answer to Question No. 2 with malice or with reckless indifference to the right of Plaintiff to be free from such practices?

Answer "Yes" or "No."

"yes"

If you have answered "Yes" to Question No. 5, please proceed to Question No. 6. If you have answered "No" to Question No. 5, do not answer any more questions. Please sign and date the Certificate and return it to the Court.

QUESTION NO. 6

What sum of money, if any, if paid now in cash, should be assessed against Williams-Sonoma and awarded to Plaintiff as exemplary damages, if any, for the conduct found in response to Question No. 5?

Answer in dollars and cents, if any:

\$ 2,574,145.00

Please sign and date the Certificate and return it to the Court.

CERTIFICATE

We the jury, have made the above findings as indicated, and herewith return same into Court as our verdict.

SIGNED this the 15th day of February, 2013, at Houston, Texas.


JURY FOREPERSON